

SUSMAN GODFREY L.L.P.

A REGISTERED LIMITED LIABILITY PARTNERSHIP
SUITE 1400
1900 AVENUE OF THE STARS
LOS ANGELES, CALIFORNIA 90067-6029
(310) 789-3100
FAX (310) 789-3150
WWW.SUSMANGODFREY.COM

SUITE 5100
1000 LOUISIANA STREET
HOUSTON, TEXAS 77002-5096
(713) 651-9366

SUITE 3800
1201 THIRD AVENUE
SEATTLE, WASHINGTON 98101-3000
(206) 516-3880

50TH FLOOR
ONE MANHATTAN WEST
NEW YORK, NEW YORK 10001-8602
(212) 336-8330

HALLEY JOSEPHS
DIRECT DIAL (310) 789-3163

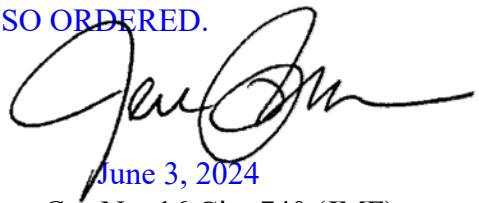
E-MAIL HJOSEPHS@SUSMANGODFREY.COM

May 31, 2024

Application GRANTED, subject to reconsideration in the event that any party or third party files a motion to unseal a particular document or documents. The Clerk is directed to terminate ECF No. 742.

Hon. Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

SO ORDERED.



June 3, 2024

Re: *Brach Family Found., Inc., et al. v. AXA Equitable Life Ins. Co.*, No. 16 Civ. 740 (JMF)

Dear Judge Furman:

Class Counsel in the above-captioned action offers this letter-motion to seal pursuant to Rule 7.B of Your Honor's Individual Rules and Practices in Civil Cases regarding Class Counsel's Motion to Authorize Additional Steps to Allocate Class Action Settlement Funds, the accompanying Memorandum of Law, Declaration of Halley Josephs in Support of the Motion, Exhibits 1–8 to the Declaration, and Proposed Order.

The redacted Memorandum of Law, Declaration, and Proposed Order, and fully sealed Exhibits reflect confidential information identifying Final Class Members and the policies owned by them. This information was designated "Confidential" by AXA pursuant to the terms of the protective order as well as by securities intermediaries who produced identifying information regarding Substituted Illustration Class Members in response to subpoenas authorized by the Court. Dkt. 672. In light of the privacy and confidentiality interests of absent class members, Class Counsel respectfully requests that the material redacted from the Memorandum of Law, Declaration, and Proposed Order, and Exhibits 1–8 in their entirety, remain under seal. *See* Dkt. 646 (granting application to seal confidential information regarding class member identities); *cf. Awestruck Mktg. Grp., LLC v. Black Ops Prods., LLC*, No. 16-CV-3639, 2016 WL 8814349, at *3 (S.D.N.Y. June 20, 2016).

May 31, 2024
Page 2

Sincerely,

/s/ *Halley Josephs*
Halley Josephs